

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

Samuel R. Maizel (SBN 189301)
samuel.maizel@dentons.com
Tania M. Moyron (SBN 235736)
tania.moyron@dentons.com
DENTONS US LLP
601 South Figueroa Street, Suite 2500
Los Angeles, California 90017-5704
Telephone: (213) 623-9300
Facsimile: (213) 623-9924

Attorneys for the Trust Board (formerly the Official
Committee of Equity Security Holders)

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re:

ICPW Liquidation Corporation, a
California corporation,¹

Debtor and Debtor in Possession.

In re:

ICPW Liquidation Corporation, a Nevada
corporation,²

Debtor and Debtor in Possession.

Affects:

☒ Both Debtors

☐ Ironclad Performance Wear
Corporation, a California corporation

☐ Ironclad Performance Wear
Corporation, a Nevada corporation.

Case No. 1:17-bk-12408-MB
Jointly administered with:
Case No. 1:17-bk-12409-MB

Chapter 11

**DECLARATION OF SCOTT JARUS IN
SUPPORT OF SECOND INTERIM AND
FINAL APPLICATION OF DENTONS
US LLP FOR APPROVAL OF FEES AND
REIMBURSEMENT OF EXPENSES**

Hearing:

Date: May 1, 2018
Time: 2:30 p.m.
Place: Courtroom "303"
21041 Burbank Blvd.
Woodland Hills, CA

I, Scott Jarus, declare as follows:

1. From September 20, 2017 to February 28, 2018, I was the Committee Chair of the
duly appointed Official Committee of Equity Security Holders (the "Equity Committee") in

¹ Formerly known as Ironclad Performance Wear Corporation, a California corporation.

² Formerly known as Ironclad Performance Wear Corporation, a Nevada corporation.

DENTONS US LLP
601 SOUTH FIGUEROA STREET, SUITE 2500
LOS ANGELES, CALIFORNIA 90017-5704
(213) 623-9300

1 ICPW Liquidation Corporation, a Nevada corporation. The Equity Committee was dissolved on
2 February 28, 2018, pursuant to the *Debtors and Official Committee of Equity Security Holders*
3 *Joint Plan of Liquidation Dated February 9, 2018* (the "Plan") [Docket No. 438] and the order
4 thereon [Docket No. 442]. Currently, I am a member of the Trust Board created and established
5 pursuant to the Plan and that certain related trust agreement dated as of February 28, 2018.

6 2. I have personal knowledge of the facts stated in this declaration and, if called to
7 testify, would and could competently testify thereto.

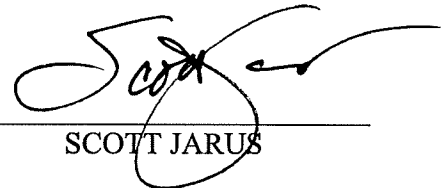
8 3. This declaration is submitted in support of the *Second Interim And Final*
9 *Application Of Dentons US LLP For Approval Of Fees And Reimbursement Of Expenses* (the
10 "Fee Application"). [Docket No. 519].

11 4. As indicated in the Fee Application, Dentons US LLP, counsel to the Equity
12 Committee, seeks (i) first and final allowance of fees of \$614,656.00 and expenses of \$25,045.35
13 for total fees and expenses of \$639,701.35 for services rendered and expenses incurred by
14 Dentons on behalf of the Equity Committee for the period of November 1, 2017 through February
15 28, 2018, and (ii) final allowance of interim awards of \$222,730.30 in fees and \$4,714.24 in
16 expenses as further described in Dentons' *First Interim Application of Dentons US LLP for*
17 *Approval of Fees and Reimbursement of Expenses* covering the period September 22, 2017
18 through October 31, 2017 [Docket No. 246], which was approved on an interim basis by Order
19 entered on December 13, 2017. [Docket No. 337].

20 5. I have reviewed the Fee Application, including exhibits, and have no objection to
21 the Fee Application and believe that the fees and expenses are reasonable and appropriate and
22 should be approved by the Court.

23 I declare and verify under penalty of perjury that the foregoing is true and correct to the
24 best of my knowledge.

25 Executed on this 16th day of April 2018, at Manhattan Beach, California.

26 
SCOTT JARUS

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 601 South Figueroa Street, Suite 2500, Los Angeles, CA 90017:

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF SCOTT JARUS IN SUPPORT OF SECOND INTERIM AND FINAL APPLICATION OF DENTONS US LLP FOR APPROVAL OF FEES AND REIMBURSEMENT OF EXPENSES** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **April 16, 2018**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shiva D Beck sbeck@gardere.com, jcharrison@gardere.com
- Ron Bender rb@lnbyb.com
- Cathrine M Castaldi ccastaldi@brownrudnick.com
- Russell Clementson russell.clementson@usdoj.gov
- Aaron S Craig acraig@kslaw.com, lperry@kslaw.com
- Natalie B. Dagbandan natalie.dagbandan@bryancave.com,
raul.morales@bryancave.com;theresa.macaulay@bryancave.com
- Steven M Gluck sgluck@juno.com
- Matthew A Gold courts@argopartners.net
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Jeffrey A Krieger jkrieger@ggfirm.com,
kwoodson@greenbergglusker.com;calendar@greenbergglusker.com;jking@greenbergglusker.com
- Samuel R Maizel samuel.maizel@dentons.com,
alicia.aguilar@dentons.com;docket.general.lit.LOS@dentons.com;tania.moyron@dentons.com;kathryn.howard@
dentons.com
- Krikor J Meshefjian kjm@lnbrb.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com
- S Margaux Ross margaux.ross@usdoj.gov
- Thomas C Scannell tscannell@gardere.com, acordero@gardere.com
- Susan K Seflin sseflin@brutzkusgubner.com
- Andrew T Solomon asolomon@solomoncramer.com
- John M Stern john.stern@oag.texas.gov, bk-mbecker@oag.texas.gov
- United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com
- Douglas Wolfe dwolfe@asmcapital.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **April 16, 2018**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **April 16, 2018**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

BY PERSONAL DELIVERY

Hon. Martin R. Barash
US Bankruptcy Court
Central District of California
21041 Burbank Blvd., Suite 342/Ctrm. 303
Woodland Hills, CA 91367

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 16, 2018 Christina O'Meara
Date *Printed Name*

/s/Christina O'Meara
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

SERVED BY U.S. MAIL:

<u>Secured Creditor</u> Radians Wareham Holding, Inc. Attn: Mike Tutor, CEO 5305 Distriplex Farms Memphis, TN 38141	<u>Counsel to Radians Wareham Holdings</u> E. Franklin Childress, Jr. Baker, Donelson, Bearman, Caldwell & Berkowitz, PC 165 Madison Ave, Suite 2000 Memphis, Tennessee 38103	U.S. Securities and Exchange Commission Attn: Bankruptcy Counsel 444 South Flower Street, Suite 900 Los Angeles, CA 90071-9591
CRG Financial LLC 100 Union Avenue Cresskill, NJ 07626		
<u>Governmental Agencies</u>		
Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	Franchise Tax Board Bankruptcy Section, MS: A-340 P.O. Box 2952 Sacramento, CA 95812-2952	State Board of Equalization Account Information Group, MIC: 29 P.O. Box 942879 Sacramento, CA 94279-0029
Employment Development Dept. Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280-0001	Office of Unemployment Compensation Tax Services Department of Labor and Industry Commonwealth of Pennsylvania 651 Boas Street, Room 702 Harrisburg, PA 17121	
<u>Trust Board - SERVED BY EMAIL</u>		
Patrick W. O'Brien 301 Whitmore Lane Lake Forest, IL 60045-4707 Email: obrien.pat@me.com	Ronald Chez 1524 N. Astor Street Chicago, IL 60610 Email: rlchez@rcn.com	Scott Jarus 938 Duncan Avenue Manhattan Beach, CA 90266 Email: scott.jarus@verizon.net
<u>Trustee - SERVED BY EMAIL</u>		
Matthew Pliskin 2718 West Terrace Drive Tampa, Florida 33609 Email: matthew@icpwliquidation.com		

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.